

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LIQWD, INC. and OLAPLEX LLC,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 17-14-SLR
)	
L'ORÉAL USA, INC., L'ORÉAL USA)	
PRODUCTS, INC., L'ORÉAL USA S/D, INC.,)	
and REDKEN 5 TH AVENUE NYC, LLC,)	
)	
Defendants.)	

DEFENDANTS' MOTION TO DISMISS

Defendants L'Oréal USA, Inc., L'Oréal USA Products, Inc., L'Oréal USA S/D, Inc., and Redken 5th Avenue NYC, LLC ("Defendants" or "L'Oréal USA"), by and through their undersigned counsel, hereby move to dismiss the Complaint (D.I. 2) pursuant to Federal Rule of Civil Procedure 12(b)(6) (the "Motion"). The grounds for this Motion are set forth fully in Defendants' Opening Brief filed contemporaneously herewith.

Of Counsel:

Dennis S. Ellis
Katherine F. Murray
Adam M. Reich
Paul Hastings LLP
515 South Flower Street, 25th Floor
Los Angeles, CA, 90071
(213) 683-6000

Naveen Modi
Joseph E. Palys
Paul Hastings LLP
875 15th Street, N.W.
Washington, D.C., 20005
(202) 551-1990

/s/ Frederick L. Cottrell, III
Frederick L. Cottrell, III (#2555)
Jeffrey L. Moyer (#3309)
Katharine L. Mowery (#5629)
Richards, Layton & Finger, P.A.
One Rodney Square
920 N. King Street
Wilmington, Delaware 19801
(302) 651-7700
cottrell@rlf.com
moyer@rlf.com
mowery@rlf.com

Attorneys for Defendants

Blaine M. Hackman
Paul Hastings LLP
200 Park Avenue
New York, NY 10166
212-318-6000

Dated: February 27, 2017